

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Debra Hayes,

Plaintiff,

V.

Primavera Primary Home Care, Inc.; Santa Maria Medical Group, Inc.; and La Gloria Health Services, Inc.,

Defendants.

Civil Action No.: 5:16-cv-00575-XR

MOTION FOR DEFAULT JUDGMENT

Plaintiff Debra Hayes (“Plaintiff”), pursuant to Fed. R. Civ. P. 55(b)(2), moves this Court for a default judgment against Defendants Primavera Primary Home Care, Inc.; Santa Maria Medical Group, Inc.; and La Gloria Health Services, Inc. (the “Defendants”). In support of her motion, Plaintiff submits the accompanying Memorandum of Law and Declaration.

WHEREFORE, Plaintiff respectfully requests this Court (i) enter a default judgment in Plaintiff's favor and against Defendants; (ii) assess actual damages against Defendants for unpaid overtime compensation, and an additional equal amount as liquidated damages; and (iii) enter an award of reasonable attorney's fees, plus costs of the action, to be paid by Defendants pursuant to 29 U.S.C. § 216(b).

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Dated: January 17, 2017.

Respectfully submitted,

PLAINTIFF, Debra Hayes

By /s/ Sergei Lemberg
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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on January 17, 2017, a copy of the foregoing served electronically by the U.S. District Court Western District of Texas Electronic Document Filing System (ECF), and that a copy was sent via First Class Mail, postage pre-paid, to the parties listed below:

Primavera Primary Home Care, Inc.
Santa Maria Medical Group, Inc
La Gloria Health Services, Inc.
107 South River Street
Seguin, Texas 78155

/s/ Sergei Lemberg
Sergei Lemberg, Esq.